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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,)	No.
)	
Plaintiff,)	<u>COUNT 1:</u>
)	SEXUAL EXPLOITATION OF A CHILD
v.)	– TRANSPORTATION OF CHILD
)	PORNOGRAPHY
HAYDEN BEARD,)	Vio. of 18 U.S.C. § 2252(a)(1)
)	and (b)(1)
Defendant.)	
)	<u>COUNT 2:</u>
)	SEXUAL EXPLOITATION OF A CHILD
)	– POSSESSION OF CHILD
)	PORNOGRAPHY
)	Vio. of 18 U.S.C. § 2252(a)(4)(B)
)	and (b)(2)
)	
)	<u>CRIMINAL FORFEITURE</u>
)	<u>ALLEGATION:</u>
)	Vio. 18 U.S.C. § 2253

I N D I C T M E N T

The Grand Jury charges that:

COUNT 1:
Sexual Exploitation of a Child – Transportation of Child Pornography

On a date unknown to the Grand Jury, but no later than January 19, 2018, , within the District of Alaska and elsewhere, the defendant, HAYDEN BEARD, did knowingly transport and ship, by any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, including by computer, visual depictions of minors engaging in sexually explicit conduct, the production of which involved the use of minors engaging in sexually explicit conduct.

All of which is in violation of Title 18, United States Code, Section 2252(a)(1) and (b)(1).

COUNT 2:
Sexual Exploitation of a Child – Possession of Child Pornography

On or about January 19, 2018, within the District of Alaska, the defendant, HAYDEN BEARD, did knowingly possess matter, to wit: an Apple iPhone and a Dell Inspiron laptop, containing visual depictions of minors engaging in sexually explicit conduct that have been mailed, and shipped and transported using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and which were produced using materials that have been mailed and shipped and transported, by any means including by computer.

The visual depictions were produced using minors engaging in sexually explicit conduct, including, but not limited to prepubescent minors and minors who had not attained the age of 12, and the visual depictions were of such conduct.

All of which is in violation of Title 18, United States Code, Section 2252(a)(4)(B) and (b)(2).

CRIMINAL FORFEITURE ALLEGATION:

Upon conviction of Counts One and Two of this Indictment, defendant HAYDEN BEARD, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253(a), his interest in any and all matter which contains visual depictions produced, transported, mailed, shipped, or received in violation thereof; any property constituting or traceable to gross profits or other proceeds the defendant obtained as a result of the aforementioned violation; and any and all property used or intended to be used to commit and to promote the commission of the aforementioned violation, including but not limited to the following:

- (1) An Apple iPhone, model number A1662, serial number C39RWFLCH2XT; and
- (2) a Dell Inspiron laptop computer seized from HAYDEN BEARD on January 19, 2018.

All pursuant to Title 18, United States Code, Section 2253 and Rule
32.2(a) of the Federal Rules of Criminal Procedure.

A TRUE BILL.

s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

s/ Kelly Cavanaugh for
KYLE REARDON
United States of America
Assistant U.S. Attorney

s/ Bryan Schroder
BRYAN SCHRODER
United States of America
United States Attorney

DATE: 2/21/18